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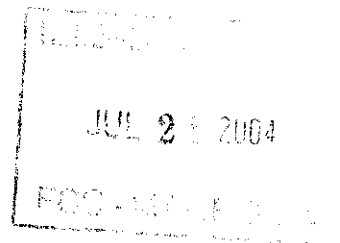
July 27, 2004
Via Overnight Delivery

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Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743



RE: Andiamo Telecom, L.L.C. Supplement to Petition for Waiver in CC Docket No. 96-128

Dear Ms. Dortch:

Enclosed for filing with the Commission on behalf of Andiamo Telecom, L.L.C. is an original and four (4) copies of the SUPPLEMENT TO PETITION FOR WAIVER of Andiamo Telecom, L.L.C. in CC Docket No. 96-128.

Please acknowledge receipt of this filing by returning, date-stamped, the extra copy of this cover letter in the self-addressed, stamped-envelope that is provided for this purpose.

Should you have any questions regarding this request, kindly address them to my attention at (407) 740-8575 or to Mr. Jack Kelley, Chief Financial Officer of Andiamo Telecom, L.L.C., 10575 N. 114th Street, Suite 103, Scottsdale, AZ 85259, telephone number 602-344-0115.

Thank you for your assistance in this matter.

Sincerely,

Sharon Thomas, Consultant to
Andiamo Telecom, LLC

Enclosure

cc: Jack Kelley, Andiamo
File: Andiamo - FCC

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
The Pay Telephone Reclassification)	CC Docket No. 96-128
and Compensation Provisions of the)	
Telecommunications Act of 1996)	

SUPPLEMENT TO PETITION FOR WAIVER

On June 18, 2004, Andiamo Telecom, L.L.C. (referred to herein as "Andiamo" or "Petitioner") filed a request for a limited waiver of the Commission's payphone call tracking system audit requirements set forth in the Commission's *Payphone Audit and Order* and section 64.1320 of the Commission's rules, 47 C.F.R. §64.1320.¹ Specifically, Andiamo requested a waiver and extension, until January 1, 2005, in which to complete the payphone system audit and file the System Audit Report with the Commission, payphone service providers ("PSPs"), and interexchange carriers ("IXCs"), as applicable. Andiamo hereby respectfully submits this supplement to its Petition for Waiver, in order to clarify Andiamo's compliance with the Commission's payphone call tracking and compensation rules and the status of its efforts to complete the audit requirements set forth in the *Payphone Audit and Order*.

I. COMPLIANCE WITH PAYPHONE TRACKING AND COMPENSATION REQUIREMENTS.

Although Andiamo requested a six month extension to complete and file the audit required under the Commission's rules, it wishes to clarify that, with the exception of the audit requirement, Andiamo believes that it has all the processes and procedures in place to comply with the payphone tracking and compensation rules and that, once completed, the required audit

¹ *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, Report and Order, 18 FCC Rcd 19975 (2003) ("*Payphone Audit Report and Order*"); 47 C.F.R. § 64.1320(a)-(b).

will demonstrate such compliance. Andiamo believes that it lacks only the audit to be in full compliance.

In fact, prior to July 1, 2004, Andiamo Telecom was remitting its payphone compensation surcharges in essentially the same manner that is required after July 1, 2004. The differences being that prior to July 1, Andiamo remitted the call information and payments to Sprint and/or Global Crossing, and the remittance was made on a monthly basis, rather than quarterly, as is the requirement beginning July 1, 2004.

Andiamo is confident that the processes and procedures it has used in the past and continues to have in place will insure that its data and payments are remitted on time and with proper documentation under the revised guidelines. Andiamo has secured an agreement with Billing Concepts, Inc. ("BCI"), to act on its behalf in remitting to the Payphone Service Providers ("PSPs") for compensable calls beginning July 1, 2004. The changes necessary to Andiamo's systems to allow it to remit the required information to BCI, in place of Sprint or Global Crossing, are minimal.

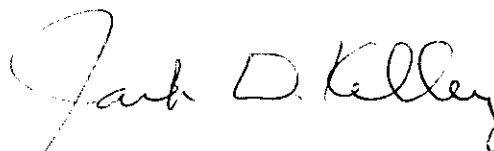
II. STATUS OF AUDIT

Andiamo requested a limited waiver of the Commission's rules solely to permit it sufficient time to complete the required audit. For reasons set forth in its original Petition for Waiver, Andiamo was unable to devote sufficient internal resources and was unable to secure a third-party auditor in time to complete and file the required audit by July 1, 2004. As of this filing, Andiamo has been able to secure two quotes for its audit. Andiamo will retroactively establish through its audit that payments for compensable calls, beginning July 1, 2004, were made using its payphone tracking system in accordance with the Commission's rules.

III. CONCLUSION

For the reasons set forth in its original Petition for Waiver and supplemented herein, Andiamo believes that just cause exists to grant its Petition for Waiver by extending the initial audit deadline for six months, until January 1, 2005, and that no party will be harmed as a result.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jack D. Kelley". The signature is fluid and cursive, with the first name "Jack" being more prominent than the last name "Kelley".

Jack D. Kelley
Chief Operating Officer
ANDIAMO TELECOM, L.L.C.
10575 N. 114th Street, Suite 103
Scottsdale, AZ 86259
Tel: 602-344-0115
Fax: 480-451-6547

Dated: July 26, 2004

VERIFICATION

Jack D. Kelley, being duly sworn, states as follows:

1. I am the Chief Operating Officer of Andiamo Telecom, L.L.C, whose address is 10575 N. 114th Street, Suite 103, Scottsdale, AZ 86259.
2. I am authorized to represent Andiamo, L.L.C. and to make this Affidavit on its behalf.
3. I have read the foregoing Supplement to Petition for Waiver, filed by Andiamo Telecom, L.L.C. in CC Docket No. 96-128. The statements contained herein are true of my own knowledge, except as to matters which are herein stated on information and belief, and as to those matters, I believe them to be true.
4. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not.

By: Jack D. Kelley

Name: Jack D. Kelley

Title: Chief Operating Officer

Date: July 26, 2004

Subscribed and sworn to before
me this 26 day of July, 2004.

Pamela A. Kemp
Notary Public

My commission expires: _____

